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GLOBAL EQUITY LENDING, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DOLORES A. ARREGUIN, for herself
and other members of the general public
similarly situated,

Plaintiff,

v.

GLOBAL EQUITY LENDING, INC., a
Georgia Corporation; and DOES 1 through
10, Inclusive,

Defendant.

CASE NO. C 07 6026 MHP

**STIPULATION TO RESOLVE PENDING
DISCOVERY DISPUTE RE GLOBAL
EQUITY LENDING INC.'S MOTION FOR
PROTECTIVE ORDER**

1. On April 11, 2008 Plaintiff noticed the deposition of GLOBAL EQUITY LENDING INC.'s, (GLOBAL) representatives pursuant to the Court's Order on March 17, 2008 that the parties engage in limited depositions on the issue of the contract purportedly agreed to by Plaintiff with GLOBAL on or about April 2, 2002, and Plaintiff's consent to the same. Said deposition notice sought the deposition of Sandy Croteau and a Personal Most Knowledgeable of GLOBAL as to five different categories of inquiry.

2. Attendant to the deposition notice Plaintiff served a request to produce documents requesting nineteen (19) categories of documents. GLOBAL perceived the designated categories for the PMK to be improper in light of the Court's order for limited depositions. GLOBAL further perceived many of the categories of the Plaintiff's documents requests to be ambiguous,

1 unintelligible overly broad and irrelevant to the issues before the Court. Further, GLOBAL
2 perceived several of the document requests as seeking documents protected by or implicating
3 some form of privilege, including invasion of business trade secrets and potentially proprietary
4 information of GLOBAL.

5 3. On April 21, 2008 GLOBAL served its formal objections to the deposition notices
6 and the document demands. Following "meet and confer" attempts and an inability to resolve the
7 issues presented by the Requests, on May 1, 2008, GLOBAL filed a Motion for Protective Order
8 with the Court pursuant to FRCP 26 along with a request for sanctions.

9 4. Following the filing of the same, GLOBAL was instructed by the Court's clerk
10 that the Honorable Marilyn Hall Patel would not hear said motion and that she desired that the
11 parties attempt "work out" the discovery dispute on their own and reach some form of stipulation.
12 GLOBAL was instructed that should the parties not be able to resolve the dispute, then they could
13 contact the Court and engage in a telephone conference with Judge Patel to resolve the issues
14 presented.

15 5. In an attempt to abide by the Court's directive and obviate the need for Court
16 intervention and resolve the discovery dispute presented by GLOBAL's motion:

17 IT IS HEREBY STIPULATED THAT:

18 a. Plaintiff will limit each and every document request set forth in her
19 Request to Produce Documents served April 11, 2008 to issues surrounding Plaintiff DOLORES
20 ARREGIUN only, and her agreements, contracts, documents and/or execution of documents and
21 contracts relating to her association with GLOBAL and its affiliated Companies, World Lending
22 Group Inc., and World Leadership Group Inc, and only as their bearing on the issues of the
23 contract and/or Plaintiffs consent to the same.

24 b. Plaintiff further agrees that Requests 1 and 2, are limited to those
25 documents related directly to Plaintiff DOLORES ARREGIUN, as opposed to any third party;
26 and that further, to the extent these Requests seeks to obtain any form of policy manual, written
27 internal guidelines or procedures, that same is withdrawn since GLOBAL deems same as
28 confidential and proprietary information and therefore protected from production by GLOBAL at

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1 this stage of the litigation.

2 c. As to Request 3, 4, 5 and 13, said Requests, are hereby withdrawn as
3 outside of the Court's order for limited depositions

4 d. As to Requests 6, 7, 8, 9, 10, 11 12 and 14 it is GLOBAL's position that it
5 has produced the documents to Plaintiff as part of its Initial Disclosure dated March 3, 2008 and
6 its Supplemental Disclosure dated April 30, 2008. Further, the Supplemental Declaration of
7 Sandra Croteau in Support of GLOBAL's Reply to Plaintiff's Opposition to Motion to Compel
8 Arbitration attached as Exhibit A, general form/exemplar documents relating to the process of
9 electronic acceptance of the contract.

10 e. It is further Stipulated that Requests 15, 16, 17, 18, and 19 are withdrawn
11 in light of their over-breadth, ambiguity and uncertainty.

12 f. It is further Stipulated that the scope of Plaintiff's inquiry as to the five
13 designated PMK categories will not extend beyond that of Plaintiff DOLORES ARREGUIN or
14 into third parties or agents of GLOBAL.

15 g. Said stipulation is without prejudice to Plaintiff re-propounding these
16 requests to the extent the Court denies GLOBAL's pending motions and the lawsuit is allowed to
17 proceed on its merits in the Federal District Court. GLOBAL hereby reserves its right to re-assert
18 all objections at that time and to file any all motions, including but not limited to a motion for
19 protective order.

20 Dated: May 13, 2008

LAW OFFICES OF HERBERT HAFIF, APC

21 By: 

FARRIS E. AIN
Attorneys for Plaintiff
DOLORES ARREGUIN

22 Dated: May 13, 2008

23 ROPERS, MAJESKI, KOHN & BENTLEY

24 By: 

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